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September 19, 1991

Peter Felitti, Esq. Assistant Regional Counsel United States Environmental Protection Agency 230 South Dearborn Street Chicago, IL 60604

Great Lakes Asphalt Site

Dear Mr. Felitti:

This firm, by the undersigned, represents AWB Metals Division of Magnode Corporation ("AWB Metals"), successor by reason of merger to Wright Manufacturing Company. This letter is written in reply to your letter of September 4, 1991.

AWB Metals takes position that the asserted claim regarding the Great Lakes Site was settled under the terms of the 1983 Envirochem consent decree. However, since AWB's predecessor was a very small generator, our client may be interested in a <u>de minimis</u> settlement covering the Great Lakes Asphalt Site simply because the cost of settlement may be less expensive than the cost of arguing about the coverage of the 1983 consent decree.

Metals, Accordingly, consider AWB successor to Wright Manufacturing Company, interested in a de minimis settlement. The amount of our interest will be directly related to the cost

## FROST & JACOBS

Peter Felitti, Esq.
United States Environmental Protection Agency
Re: Great Lakes Asphalt Site
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of the settlement. Please keep us informed on the amount your agency would be willing to accept in a <u>de minimis</u> settlement.

Very truly yours,

Thomas U/ perope

FROST & JACOBS

Thomas A. Swope

TAS:brw

cc: Arthur W. Bidwell
Anthony Walter